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Air & Radiation Division

October 18, 2019
USEPA – Region III, Air Protection Division
Office of Air Enforcement & Compliance Assistance - NSPS
1650 Arch Street (3AP000)
Philadelphia, PA 19103-2029

RE: Annual Compliance Report – Compliance Period: August 2, 2018 – August 1, 2019

New Source Performance Standard Subpart OOOOa

Arsenal Midstream LLC

To Whom It May Concern:

Arsenal Midstream LLC (Arsenal) submits this letter and attachments to meet the annual reporting requirements for New Source Performance Standard (NSPS) Subpart OOOOa (40 CFR §60.5420a) for affected facilities constructed, reconstructed, or modified after September 18, 2015.

The attachments contain required information for the affected facilities operated by Arsenal during the initial compliance period for NSPS Subpart OOOOa (August 2, 2018 through August 1, 2019). In accordance with the rule, this report is being submitted no later than 90 days after the end of the initial compliance period (October 31st). The reporting requirements are summarized as follows:

> §60.5420a(b)(1): The general information specified in paragraphs (b)(1)(i) through (iv) of this section.

Included in Attached Excel file.

≽ §60.5420a(b)(2): For each gas well affected facility, the information in paragraphs
(b)(2)(i) through (iii) of this section.

Arsenal Midstream does not operate gas well affected facilities.

> §60.5420a(b)(3): For each centrifugal compressor affected facility, the information specified in paragraphs (b)(3)(i) through (iv) of this section.

Arsenal Midstream does not operate centrifugal compressor affected facilities as identified in §60.5365a(b).

§60.5420a(b)(4): For each reciprocating compressor affected facility, the information specified in paragraphs (b)(4)(i) and (ii) of this section.
Included in attached Excel file.

- > §60.5420a(b)(5): For each pneumatic controller affected facility, the information specified in paragraphs (b)(5)(i) through (iii) of this section.
 - Arsenal Midstream does not operate pneumatic controller affected facilities as identified in §60.5365(d). It should be known that Arsenal does operate pneumatic controllers installed after September 18, 2015, but these devices are intermittent and/or low-bleed devices. As such, they are not considered pneumatic controller affected facilities as defined under NSPS Subpart OOOOa.
- §60.5420a(b)(6): For each storage vessel affected facility, the information in paragraphs (b)(6)(i) through (vii) of this section.
 Arsenal Midstream does not operate any storage vessel affected facilities as identified in §60.5365a(e). It should be known that Arsenal does operate storage vessels with the potential for VOC emissions that were installed after September 15, 2015. However, the VOC emissions from these storage vessels are less than 6.0 tons per year which accounting for enforceable limitations, they are not storage vessel affected facilities as defined under NSPS Subpart OOOOa.
- ➤ §60.5420a(b)(7): For the collection of fugitive emissions components at each well site and the collection of fugitive emissions components at each compressor station within the company-defined area, the records of each monitoring survey including the information specified in paragraphs (b)(7)(i) through (xii) of this section.

 Included in attached Excel file.
- §60.5420a(b)(8): For each pneumatic pump affected facility, the information specified in paragraphs (b)(8)(i) through (iii).
 Arsenal Midstream does not operate pneumatic pump affected facilities as identified in §60.5365a(h).

Please feel free to contact me at 724-940-1185, if there are questions regarding the information in this Initial Annual Report.

Sincerely,

Arsenal Midstream LLC

Greg McCully,

Director of Health, Safety & Environment

For each affected facility, an owner or operator must include the information specified in parag The asterisk (*) next to each field indicates that the corresponding field is required. 40 CFR Part 60 - Standards of Performance for Crude Oil and Natural Gas Facilities for which Co

1, 2, 3, 4, 3, 4, 5, 5, 7, 9, 9,	Facility Record No. * (Field value will automatically generate if a value is not entered.)	The asterisk (*) next to each
1 Arsenal Midstream, LLC 2 Arsenal Midstream, LLC 3 Arsenal Midstream, LLC 4 Arsenal Midstream, LLC 5 Arsenal Midstream, LLC 5 Arsenal Midstream, LLC 6 Arsenal Midstream, LLC 7 Arsenal Midstream, LLC 8 Arsenal Midstream, LLC 9 Arsenal Midstream, LLC	Company Name * (§60.5420a(b)(1)(i))	The asterisk (*) next to each field illuicates that the cornesponding here is required
Cather Compressor Station Cather Compressor Station Goff Compressor Staiton Comet Compressor Station	Facility Site Name * (§60.5420a(b)(1)(i)) e.g.: XYZ Compressor Station	Pilcia is ichairea.

nstruction, Modification or Reconstruction Commenced After September 18, 2015 - raphs (b)(1)(i) through (iv) of this section in all annual reports:

	e.g.: 12-345-67890-12	US Well ID or US Well ID Associated with the Affected Facility, if applicable. * (§60.5420a(b)(1)(i))
2439 Wendal Road 2439 Wendal Road 50 E. Davisson Run Road 60 E. Davisson Run Road Route 50E, Wendel Road	e.g.: 123 Main Street	Address of Affected Facility * (\$60.5420a(b)(1)(i))
	e.g.: Suite 100	Address 2
Flemington Flemington Clarksburg Clarksburg Clarksburg Clarksburg Wendel Wendel Wendel Wendel Wendel	e.g.: Brooklyn	City *
Taylor Taylor Taylor Harrison Harrison Harrison Taylor Taylor Taylor Taylor Taylor Taylor	e.g.: Kings Count	County *

	State Abbreviation *	
26347 26347 26302 26302 26302 26302 26302 26352 26354 26354 26354	Zip Ag Code *	
26347 033-00269 26347 033-00269 26347 033-00187 26302 033-00187 26302 033-00187 26302 033-00187 26302 033-00187 26354 091-00034 26354 091-00034 26354 091-00034 26354 091-00034 26354 091-00034	Responsible Agency Facility ID (State Facility Identifier)	
	Description of Site Location (§60.5420a(b)(1)(i)) e.g.: 7 miles NE of the intersection of Hwy 123 and Hwy 456	
39.29864 39.29864 39.27917 39.27917 39.27917 39.27917 39.30575 39.30575 39.30575 39.30575 39.30575	Latitude of the Site (decimal degrees to 5 decimals using the North American Datum of 1983) (§60.5420a(b)(1)(i))	
-80.11035 -80.11035 -80.40417 -80.40417 -80.40417 -80.40417 -80.10761 -80.10761 -80.10761 -80.10761	Longitude of the Site (decimal degrees to 5 decimals using the North American Datum of 1983) (§60.5420a(b)(1)(i))	

8/2/2017 8/2/2017 8/2/2017 8/2/2017 8/2/2017 8/2/2017 8/2/2017 8/2/2017 8/2/2017 8/2/2017 8/2/2017 8/2/2017	Beginning Date of Reporting Period.* (§60.5420a(b)(1)(iii))
8/1/2018 8/1/2018 8/1/2018 8/1/2018 8/1/2018 8/1/2018 8/1/2018 8/1/2018 8/1/2018 8/1/2018 8/1/2018	Ending Date of Reporting Period.* (§60.5420a(b)(1)(iii))
	Please provide the file name that contains the certification signed by a qualified professional engineer for each closed vent system routing to a control device or process. * (\$60.5420a(b)(12)) Please provide only one file per record. e.g.: Certification.pdf or XYZCompressorStation.pdf
	Please enter any additional information.
	Enter associated file name reference. e.g.: addlinfo.zip or XYZCompressorStation .pdf

The asterisk (*) next to each field indicates that the corresponding field is required. For each reciprocating compressor affected facility, an owner or operator must include the information specified in paragraph 40 CFR Part 60 - Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Rec

1 2 3 4 8		Facility Record No. * (Select from dropdown list - may need to scroll up)	
1 Cather 2657 (CE-5R) 2 Cather 2669 (CE-6R) 3 Goff 2439 (CE-7R) 4 Goff 2408 (CE-8R) 5 Goff 2477 (CE-9R) 8 Comet 6205 (CE-6R)	e.g.: Comp-12b	Compressor ID * (§60.5420a(b)(1)(ii))	
N N N N N N N N N N N N N N N N N N N	e.g.: no	Facility Record No. * (Select from dropdown (\$60.5420a(b)(1)(ii)) list - may need to scroll up) Are emissions from the rod packing unit being routed to a process through a closed vent system under negative pressure? * (\$60.5420a(b)(4)(i))	
24,359 23,363 18,490 17,942 1,022 11,582	e.g.∴ 2	If emissions are not routed to a process through a closed vent system under negative pressure, what are the cumulative number of hours or months of operation since initial startup or the previous rod packing replacement (whichever is later)? * (§60.5420a(b)(4)(i))	

onstruction Commenced After September 18, 2015 - (b)(4)(i) and (ii) of this section in all annual reports:

Hours Hours Hours Hours Hours	e.g.: months	Units of Time Measurement * (§60.5420a(b)(4)(i))
NA NA NA	e.g.: Rod packing replacement exceeded 36 months.	Deviations where the reciprocating compressor was not operated in compliance with requirements* (§60.5420(b)(4)(ii) and §60.5420a(c)(3)(iii))

For the collection of fugitive emissions components at each well site and the collection of fugitive emissions components at each compressor 40 CFR Part 60 - Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Cc

	Facility Record No. * (Select from dropdown list - may need to scroll up)	The asterisk (*) next to each
e.g.: Well Site ABC	Identification of Each Affected Facility * (§60.5420a(b)(1))	The asterisk (*) next to each field indicates that the corresponding field is required.
e.g.: 8/13/17	Date of Survey * (§60.5420a(b)(7)(i))	

3 Goff Comp	3 Goff Comp	3 Goff Comp	3 Goff Comp	1 Cather Co	1 Cather Co	1 Cather Co	1 Cather Co	8 Comet Co	8 Comet Cor	8 Comet Cor	8 Comet Cor	8 Comet Cor	
3 Goff Compressor Staiton	1 Cather Compressor Station	8 Comet Compressor Station											
4/30/2019	2/21/2019	12/13/2018	8/21/2018	4/30/2019	2/21/2019	12/13/2018	8/21/2018	4/30/2019	2/21/2019	12/12/2018	12/12/2018	8/21/2018	

r station within the company-defined area, an owner or operator must include the records of ımmenced After September 18, 2015 - 60.5420a(b) Annual Report

7:50 AM 11:42 AM 11:42 AM 8:45 AM 12:00 PM 9:35 AM 2:55 PM 10:35 AM 2:30 PM 9:01 AM 2:05 PM 9:45 AM 3:10 PM	e.g.: 10:00 am	Survey Begin Time * (§60.5420a(b)(7)(ii))
8:28 AM 12:35 AM 12:35 AM 9:12 AM 10:15 AM 10:15 AM 3:27 PM 11:02 AM 3:05 PM 9:32 AM 2:47 PM 10:30 AM 15:42	e.g.: 1:00 pm	Survey End Time * (§60.5420a(b)(7)(ii))
8:28 AM Steve LaRue 12:35 AM Steve LaRue 12:35 AM Steve LaRue 9:12 AM Steve LaRue 12:56 PM Steve LaRue 10:15 AM Steve LaRue 3:27 PM Steve LaRue 11:02 AM Steve LaRue 9:32 AM Steve LaRue 9:32 AM Steve LaRue 10:30 AM Steve LaRue	e.g.: John Smith e.g	T- Name of Surveyor * Di (§60.5420a(b)(7)(iii)) (§
71 cloudy 33 cloudy 33 cloudy 41 cloudy 81 cloudy 78 cloudy 41 cloudy 43 cloudy 82 cloudy 76 cloudy 41 cloudy 43 cloudy 41 cloudy 43 cloudy 43 cloudy	e.g.: 90°F e.g.: Sunny, no clouds	Ambient Temperature Sky Conditions During Survey During Survey *
2 FLIR GES 1 FLIR GES 1 FLIR GES 2 FLIR GES 0 FLIR GES 5 FLIR GES 2 FLIR GES 4 FLIR GES 0 FLIR GES 5 FLIR GES 4 FLIR GES 4 FLIR GES 6 FLIR GES 7 FLIR GES 7 FLIR GES 7 FLIR GES 8 FLIR GES 9 FLIR GES	e.g.: Compa ny ABC e.g.: 2 mph optical gas imaging camera	Monito ring Maximum Wind Speed During Survey * ((§60.5420a(b)(7 (§60.54 20a(b)(7 (960.54 20a(b)(7 (960.54 20a(b)(7 (960.54 20a(b)(7)(v))))

None None None None None None None None	e.g.: None	Deviations From Monitoring Plan (If none, state none.) * (§60.5420a(b)(7)(v i))
Connection Connection Valve Valve Valve Connection None None None Connection Connection	e.g.: Valve	Type of Component for which Fugitive Emissions Detected * (§60.5420a(b)(7)(vii))
	e.g.:3	Number of Each Component Type for which Fugitive Emissions Detected * (§60.5420a(b)(7)(vii))
1 NA 1 NA 1 NA 1 NA 1 NA 0 NA 0 NA 0 NA 1 NA 1 NA 1 NA 1 NA	e.g.: Valve	Type of Component Not Repaired as Required in §60.5397a(h) * (§60.5420a(b)(7)(viii))
N N N N N N N N N N N N N N N N N N N	e.g.: 1	Number of Each Component Type Not Repaired as Required in § 60.5397a(h) * (§60.5420a(b)(7)(viii))
N N N N N N N N N N N N N N N N N N N	e.g.: Valve	Type of Difficult-to- Monitor Components Monitored * (§60.5420a(b)(7)(ix))

NA NA NA NA NA NA	e.g.: 1	Number of Each Difficult-to-Monitor Component Type Monitored * (§60.5420a(b)(7)(ix))
N N N N N N N N N N N N N N N N N N N	e.g.:Valve	Type of Unsafe-to- Monitor Component Monitored * (§60.5420a(b)(7)(i
N N N N N N N N N N N N N N N N N N N	e.g.: 1	Number of Each Unsafe-to-Monitor Component Type Monitored * (§60.5420a(b)(7)(ix))
8/21/2018 1/24/2019 1/24/2019 2/27/2019 5/3/2019 8/21/2018 NA NA NA NA NA NA NA NA NA NA NA S/21/2018	e.g.: 11/10/16	Date of Successful Repair of Fugitive Emissions Component * (§60.5420a(b)(7)(x))
NA Connection Valve NA NA NA NA	e.g.: Valve	Type of Component Placed on Delay of Repair * (§60.5420a(b)(7)(xi))

NA N	e.g.: 1	Number of Each Component Type Placed on Delay of Repair * (§60.5420a(b)(7)(xi))
NA Unsafe to repair until next shut down Unsafe to repair until next shut down NA	e.g.: Unsafe to repair until next shutdown	Explanation for Delay of Repair * (§60.5420a(b)(7)(xi))
NA FLIR GF320 NA NA NA NA NA NA NA	e.g.: Company ABC optical gas imaging camera	Type of Instrument Used to Resurvey Repaired Components Not Repaired During Original Survey * (§60.5420a(b)(7)(xii))

Training and Experience of Surveyor * (§60.5420a(b)(7)(iii))	Was a monitoring survey waived under § 60.5397a(g)(5)? * (§60.5420a(b)(7))	If a monitoring survey was waived, the calendar months that make up the quarterly monitoring period for which the monitoring survey was waived. * (§60.5420a(b)(7))
e.g.: Trained thermographer; completed 40-hour course at XYZ Training Center. Has 10 years of experience with OGI surveys.	e.g.: Yes	e.g.: January; February; and March
Infrared Training Center over 500 site inspections		N N N N N N N N N N N N N N N N N N N
Infrared Training Center over 500 site inspections Infrared Training Center over 500 site inspections	N N	NA T